Acton Town Council

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Regional Planning Commission February 24, 2014

The Los Angeles County Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012

Subject: Acton Town Council Objections to the Draft General Plan
Reference: Regional Planning Commission Hearing February 26, 2014

Commissioners Modugno, Valadez, Louie, Shell, and Pedersen:

The Acton Town Council has reviewed the Draft General Plan (released January 2014) and has substantial concerns regarding many of the proposed General Plan elements. In particular, the Acton Town Council is concerned that the draft General Plan fails to discuss how rural communities will be protected from "incompatible development" or what "incompatible development" even is. The Acton Town Council also opposes the "Guiding Principles", goals, and policies pertaining to corridor and transit oriented development as they are written in the draft General Plan. Finally, the Acton Town Council disagrees with the exceedingly high floor-to-area ratio ("FAR") that the draft General Plan authorizes for rural commercial and non-residential land uses.

<u>The Draft General Plan Fails To Protect Rural Communities Such As Acton.</u>
Under the current general plan program, Acton is a "designated rural community" which is specifically protected from commercial and residential development that introduces or expands public infrastructure such as traffic signals, sewers, streetlights, sidewalks, etc. Some of these protections were included in the 2008 version of the draft General Plan (see page 27). However, ***all of these protections are completely eliminated in the draft General Plan***, which merely states that "rural character" will be protected from "incompatible development". The draft General Plan does not even bother to define what "rural character" is, and it certainly does not explain how it will be "protected". The Commission is advised that "Rural" lands constitute 85% of the developed planning area that must be addressed by the General Plan (see Table 6.1). Yet, incredibly, the Land Use Element mentions the word "rural" only 15 times! Rural lands are, *by far*, the predominant land use

in unincorporated Los Angeles County, and the County has a statutory obligation to thoroughly and completely address this predominant land use in any General Plan that is adopted. The draft General Plan fails to meet this statutory obligation, and is therefore substantially deficient.

The Draft General Plan Fails To Limit Transit Oriented Development To Urban Areas.
The Draft general Plan states categorically that "Smart Growth" is the primary "Guiding Principal" for general plan sustainability, and the centerpieces of "Smart Growth" are high density "transit oriented development" around existing transit centers and high intensity "corridor development" along transportation corridors that connect major centers (see page 16). This "Guiding Principal" is not constrained to urban areas and in fact, is particularly applicable to the community of Acton, which has a Metrolink Station and which straddles a freeway and several major highways connecting two significant urban centers (the Antelope Valley and the San Fernando Valley). As written, this "Guiding Principal" of the Draft General Plan is unacceptable to the Acton Town Council, as are all the accompanying goals and policies which fail to constrain these "smart growth" strategies to urban areas.

The Floor-To-Area Ratio Authorized By The Draft General Plan Is Unacceptable.
The only specific "rural" protection provision identified in the draft General Plan is a condition that limits the floor-to-area ratio ("FAR") of rural commercial and non-residential development to 0.5. This arbitrary limit is far too high and more importantly, it fails to address the intensity of such development which is, by far, ***the most important*** consideration in rural communities. The Commission is reminded that the highly controversial "Panda" project (which was ultimately deemed too "intensive" for the community of Acton) had a FAR of only 0.14. As written, the Draft General Plan explicitly authorizes commercial development in Acton that is 3 times more intense than the "Panda" project without restraint and without regard for the impacts created by such developments such as traffic, noise, infrastructure expansion, etc. The Acton town Council is staunchly opposed to any land use goal or policy that authorizes rural commercial and non-residential development based merely on a perfunctory FAR value and which fails to constrain such development in a manner that protects rural communities from increased traffic, noise, and infrastructure development.

The Regional Planning Commission is further advised that the Acton Town Council generally agrees with the comments and concerns raised by Acton resident Jacqueline Ayer regarding the draft General Plan (see her letter to the Los Angeles County Department of Regional Planning dated February 19, 2014), and anticipates that the draft General Plan will be revised to fully address both her concerns and the issues raised herein.

Sincerely,

Michael Hughes
President, Acton Town Council

Members, Acton Town Council:
/s/ RJ Acosta
/s/ Ray Billet
/s/ Mike Hainline
/s/ Thor Merich
/s/ Fred Miller
/s/ Katherine Tucker
/s/ Lenore Wegstrom

Cc: Mr. Norm Hickling, Deputy to Supv. Antonovich

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